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April 30, 2019

## By ECF

Hon. Ramon E. Reyes, Jr. United States District Court Eastern District of New York 225 Cadman Plaza East Brooklyn, New York 11201

Re:

Debora Bayne, et al. v. NAPW, Inc., et al. Docket No. 18-CV-3591 (MKB) (RER)

Dear Judge Reyes:

We are counsel for defendants NAPW, Inc., d/b/a National Association of Professional Women and d/b/a International Association of Women, and Professional Diversity Network, Inc., d/b/a National Association of Professional Women and d/b/a International Association of Women (collectively "Defendants"). We write with the consent of counsel for plaintiff Debora Bayne and all other persons similarly situated to request a brief, six-day adjournment of the pre-trial conference scheduled for May 2, 2019 at 12:30 p.m.. We respectfully submit that the requested adjournment is warranted based on our pending application brought on by Order to Show Cause for leave to withdraw, which is returnable on May 8, 2019. We request the conference be rescheduled to take place after the hearing on the Order to Show Cause currently scheduled for May 8, 2019 at 12:00 p.m., or to such other later date that may be convenient for the Court.

This is the parties' second request for an adjournment of the subject conference, the previous request was granted.

Respectfully submitted,

/s/ Mark S. Mulholland Mark S. Mulholland For the Firm

cc: Jack L. Newhouse, Esq. (via ECF)